

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**IN RE: EQUIFAX INC.
CUSTOMER DATA SECURITY
BREACH LITIGATION**

**MDL Docket No. 2800
No. 1:17-md-2800-TWT**

**This document relates to:
CONSUMER CASES**

**MOTION TO DISMISS CONSOLIDATED
CONSUMER CLASS ACTION COMPLAINT**

Under Rule 12(b) of the Federal Rules of Civil Procedure, Equifax moves to dismiss the Consolidated Consumer Class Action Complaint for the reasons set out in the accompanying memorandum of law.

DATED: June 27, 2018

Respectfully Submitted,

/s/ David L. Balser

KING & SPALDING LLP

David L. Balser

Georgia Bar No. 035835

Phyllis B. Sumner

Georgia Bar No. 692165

S. Stewart Haskins II

Georgia Bar No. 336104

Elizabeth D. Adler

Georgia Bar No. 558185

John C. Toro

Georgia Bar No. 175145

1180 Peachtree Street, N.E.

Atlanta, Georgia 30309

Tel.: (404) 572-4600

Fax: (404) 572-5140

dbalser@kslaw.com

psumner@kslaw.com

shaskins@kslaw.com

eadler@kslaw.com

jtoro@kslaw.com

Counsel for Equifax Defendants

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This Response was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted, this 27th day of June, 2018.

/s/ David L. Balser

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ David L. Balser
David L. Balser